



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/12/2001

Time Start \_\_\_\_\_

Time Finish \_\_\_\_\_

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name CR Warner-Yankee Point Terminal I.D. Number PA0000538827Site Address 6050 W Passyunk AveCounty Philadelphia Municipality Philadelphia Zip 19153Name of Inspector Michelle MilburnName & Title of Responsible Official Robert Krawiecki, PresidentPerson Interviewed Rose Krawiecki Telephone ( 215 ) 726-4300Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: 220 Pounds \_\_\_\_\_ Kgs \_\_\_\_\_

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
D001	solvent / flammable liquids	

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## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CR Warner - YPT ID Number PA0000538827 Date 10/12/2001

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
X				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name CR Warner - YPT ID Number PA0000538827 Date 10/12/2001

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 10/12/2001 Identification Number PA 0000538827Company/Facility/Site Name CR Warner- Yankee Point Terminal

A large quantity hazardous waste generator inspection was conducted by Michelle Milburn, Waste Management Specialist, with the PADEP. Present for the facility was Rose Krawiecki.

In the past year, this facility has been scaling back their operations. Due to new operating procedures, the facility no longer generates a large quantity of hazardous waste. The facility has submitted an EPA Renotification Form in order to change their generator classification to "Conditionally-Exempt Small Quantity Generator."

No Violations Cited

*This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.*

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*Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.*

Person interviewed (signature) Rose Krawiecki Date 10/12/01Inspector (signature) Michelle Milburn

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



HAZARDOUS WASTE INSPECTION REPORT  
TRANSPORTERS - PART A

Date of Inspection 4/10/2001 Time Start \_\_\_\_\_ Time finish \_\_\_\_\_

Name of Inspector Michelle Milburn

Transporter Company Name C.R. Warner, Inc.

Inspection Location 6050 West Passyunk Ave., Philadelphia, PA 19153

County Philadelphia Municipality Philadelphia

EPA Identification Number PA0000538827

Name of responsible official Robert Krawiecki

Title President

Mailing Address same

Area Code and telephone number 215-726-4300

Name of person interviewed Rose Krawiecki

Title \_\_\_\_\_

Mailing address (if different from above) same

Area code and telephone number same

1. a. Pa. hazardous waste transporter (HWT) license number PA-AH0460

b. Expiration date 4/30/2002

2. Hazardous waste handling: ☒ N/A

a. ☐ Blending

☐ Mixing

b. ☐ Storage

☐ Treatment

☐ Disposal

c. ☐ Use

☐ Reuse

☐ Recycle

☐ Reclaim

3. Does the transporter generate hazardous wastes? ☒ Yes ☐ No ☐ N/A

4. Types of hazardous waste produced by Hazardous Waste Number:

F005- Toluene

F002- Waste Petroleum Product

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# HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS - PART B

Site Name CR Warner, Inc. ID Number PA0000538827 Date 4/10/2001

1-No Violation Observed 2-Not Applicable 3-Not Determined 4-Non-Compliance

STATUS				REQUIREMENT	PA Citation 25 PA Code	Federal Citation 40 CFR	LINE ITEM
1	2	3	4				
X				Identification number	263a.11	263.11	H500
X				Company licensed by PA DEP	263a.13		H501
X				License conditions met: License card on vehicle	SWMA 6018.403a		H502
X				License conditions met: PPC plan on vehicle	SWMA 6018.403a		H503
X				License conditions met: Insurance card on vehicle	SWMA 6018.403a		H504
X				The Transporter's Name is printed or typed on the manifest	263a.20(2)		H505
X				Properly completed manifest accompanies all shipments	263a.10	263.20(c)	H506
X				Required number of copies of the manifest accompanies shipment	263a.10	263.20(c)	H507
X				Entire quantity delivered as stated on manifest	263a.10	263.21(a)	H508
X				Undeliverable shipment procedures followed	263a.10	263.21(b)	H509
X				Only normal in-transit storage of waste	263a.12	263.12	H510
X				In-transit storage contingency plan approved by department for storage up to 10 days	263a.12		H511
X				Records retained at designated location	263a.10	263.22	H512
X				Proper action taken as a result of a spill.	263a.30	263.30	H513
X				Hazardous waste discharge during transportation properly cleaned up.	263a.10	263.31	H514
X				Department notified of spill event during transportation	263a.30		H515

COMMONWEALTH OF PENNSYLVANIA  
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## INSPECTION REPORT COMMENTS

Date of Inspection 4/10/2001 Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc

A hazardous waste transporter inspection was conducted by Michelle Milburn, Waste Management Specialist, with the PADEP. Present for the facility was Rose Krawiecki.

A truck inspection was conducted. The truck contained the up-to-date insurance information and PADEP transporter license card. A PPC Plan and Operations Manual are also kept in the cab of the truck. The truck is properly labeled and contains spill equipment.

Hazardous waste manifests for the past year were reviewed. All manifests were properly completed. Quarterly reports are submitted to the PADEP.

No Violations Cited.

This license with PADEP expires April 30, 2002. CR Warner will likely not be renewing the license.

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*Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.*

Person interviewed (signature) Rose KrawieckiDate 4/10/01Inspector (signature) Michelle Milburn



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/23/2000Time Start 10:15 Am

Time Finish \_\_\_\_\_

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name C.R. Warner, Inc. I.D. Number PA0000538827Site Address 6050 W. Passyunk Ave., Philadelphia, PA 19153County Philadelphia Municipality Philadelphia Zip 19153Name of Inspector Michelle MilburnName & Title of Responsible Official Robert Krawiecki, PresidentPerson Interviewed Rose Krawiecki Telephone ( 215 ) 726-4300Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: > 2200 Pounds \_\_\_\_\_ Kgs \_\_\_\_\_

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name C.R. Warner License Number PA-AH 0460

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
FO05	Waste Toluene	Marisol, Inc. Middlesex, NJ NSD002454544
FO02	Waste Petroleum Product	Keystone Cement Bath, PA PAD002389559



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## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CR Warner ID Number PA0000538827 Date 10/23/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name CR Warner ID Number PA0000538827 Date 10/23/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 10/23/2000 Identification Number PA 0000538827Company/Facility/Site Name C.R. Warner, Inc.

A hazardous waste (large-quantity) generator inspection of C.R. Warner was conducted by Michelle Milburn, Solid Waste Specialist, with the PADEP. Present from CR Warner was Rose Krawiecki.

The on-site lab was inspected. This lab has one satellite accumulation container for waste toluene. This container was properly labeled. The main storage area was inspected. Presently the storage area contains one drum of waste toluene. This drum is properly labeled and dated. The containment area has filled up with some water, probably from recent rain. Mrs. Krawiecki stated that she would have this waste storage area cleaned out. The facility also generates some hazardous waste oil when they must refuse an incoming waste oil shipment. There was not any hazardous waste oil on-site at the time of the inspection.

Manifests were reviewed. Toluene was last shipped out on 8/18/00. Waste petroleum product was last shipped out on July 22, 2000. All manifests were fully and properly completed. Training records were reviewed for annual training (includes Right to Know, Hazwoper, PPE & materials handling) as well as a recent spill training.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Rose Krawiecki Date 10/23/00Inspector (signature) Michelle Milburn

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of Inspection 10/23/2000 Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

The PPC Plan and the Source Reduction Strategy are on site and have not changed since the last inspection. Daily inspections are conducted and the log forms were reviewed. The facility Biennial Report was submitted; a copy is kept on file at the facility.

No violations are being cited.

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Person interviewed (signature) Pese KrawinskiDate 10/23/00Inspector (signature) Michelle Millum

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 19 June 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

A follow-up hazardous waste generator partial inspection of C.R. Warner was conducted by Michelle Milburn, Solid Waste Specialist, with the Department of Environmental Protection.

The following observations were made:

1) On June 15, 2000, a letter was received from C. R. Warner in response to the Notice of Violation issued on April 20, 2000. Attached to the letter was a Form 25R Source Reduction Strategy for hazardous waste. This Source Reduction Strategy was reviewed and was found to be complete and satisfactory.

The following violation has been corrected:

Line H020: A source reduction strategy was unable to be located during the inspection. This is contrary to PA Code Chapter 262a.100. The facility should prepare and implement a source reduction strategy and should keep this document on site and available for inspection.

One violation has been corrected

A copy of this report was mailed to the facility on the date indicated below. At this time all violations from the March 1, 2000 inspection have been corrected. However, a decision regarding the hazardous waste storage in the tanker trucks is pending the receipt of a narrative describing current waste handling practices.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Person interviewed (signature) copy mailed to facilityDate 6/19/2000Inspector (signature) Michelle MilburnDate 6/19/2000

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



HAZARDOUS WASTE INSPECTION REPORT  
TRANSPORTERS - PART A

Date of Inspection June 1, 2000 Time Start 10:00 am Time finish \_\_\_\_\_

Name of Inspector Michelle Milburn

Transporter Company Name C.R. Warner, Inc.

Inspection Location 6050 W. Passyunk Ave., Philadelphia, PA 19153

County Philadelphia Municipality Philadelphia

EPA Identification Number PA0000538827

Name of responsible official Robert Krawiecki

Title President

Mailing Address same

Area Code and telephone number 215-726-4300

Name of person interviewed Rose Krawiecki

Title Manager

Mailing address (if different from above) same

Area code and telephone number 215-726-4300

1. a. Pa. hazardous waste transporter (HWT) license number PA-AH0460

b. Expiration date 4/30/2001

2. Hazardous waste handling: ☐ N/A

a. ☐ Blending

☐ Mixing

b. ☐ Storage

☐ Treatment

☐ Disposal

c. ☐ Use

☐ Reuse

☐ Recycle

☐ Reclaim

3. Does the transporter generate hazardous wastes? ☒ Yes ☐ No ☐ N/A

4. Types of hazardous waste produced by Hazardous Waste Number:

F005 - Toluene

F002 - Waste Petroleum Product

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS - PART B

Site Name C.R. Warner ID Number PA 000538827 Date 6/1/2000

1-No Violation Observed 2-Not Applicable 3-Not Determined 4-Non-Compliance

STATUS				REQUIREMENT	PA Citation 25 PA Code	Federal Citation 40 CFR	LINE ITEM
1	2	3	4				
X				Identification number	263a.11	263.11	H500
X				Company licensed by PA DEP	263a.13		H501
X				License conditions met: License card on vehicle	SWMA 6018.403a		H502
X				License conditions met: PPC plan on vehicle	SWMA 6018.403a		H503
X				License conditions met: Insurance card on vehicle	SWMA 6018.403a		H504
X				The Transporter's Name is printed or typed on the manifest	263a.20(2)		H505
X				Properly completed manifest accompanies all shipments	263a.10	263.20(c)	H506
X				Required number of copies of the manifest accompanies shipment	263a.10	263.20(c)	H507
X				Entire quantity delivered as stated on manifest	263a.10	263.21(a)	H508
X				Undeliverable shipment procedures followed	263a.10	263.21(b)	H509
X				Only normal in-transit storage of waste	263a.12	263.12	H510
X				In-transit storage contingency plan approved by department for storage up to 10 days	263a.12		H511
X				Records retained at designated location	263a.10	263.22	H512
X				Proper action taken as a result of a spill.	263a.30	263.30	H513
X				Hazardous waste discharge during transportation properly cleaned up.	263a.10	263.31	H514
X				Department notified of spill event during transportation	263a.30		H515

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 June 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

A hazardous waste transporter inspection of C.R. Warner was conducted by Michelle Milburn and Andy Sinclair, Solid Waste Specialists, with the Department of Environmental Protection. Present from C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Manager.

The following observations were made:

1) C.R. Warner has a hazardous waste transporter license (# PA-AH 0460) covering 31 of their trucks. This license was recently renewed on April 30, 2000. While many of the tanker trucks are licensed to transport hazardous waste, only a few of the trucks are actually used to transport the hazardous waste petroleum to Leystone Cement. At the time of the inspection none of the regularly used trucks were on site.

2) One truck that was being serviced was available for inspection. The truck contained an operations manual which included MSDS sheets and information contact lists. There was also another binder that contained a copy of the facility PPC Plan. Each driver carries a packet with them on all trips which contains the PA Hazardous Transporter License and the insurance cards.

3) Manifests were available and were inspected. C. R. Warner is also the generator of the hazardous wastes that they transport. Therefore, the generator, transporter and return copies were on file for each shipment. All manifests were properly completed.

No Violations Are Being Cited

A copy of this report was mailed to the facility on the date indicated below. The results of this inspection were discussed with Ms. Krawiecki before leaving the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to facilityDate 6/5/2000Inspector (signature) Michelle MilburnDate 6/5/2000



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 June 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

A follow-up hazardous waste generator partial inspection of C.R. Warner was conducted by Michelle Milburn and Andy Sinclair, Solid Waste Specialists, with the Department of Environmental Protection. Present from C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Manager.

The following observations were made:

1) On May 3, 2000, a letter was received from C. R. Warner in response to the Notice of Violation issued on April 20, 2000. A letter was also sent to the Division of Reporting (PADEP) in Harrisburg, PA, regarding the manifest violations on manifest number PAX 9497283. During the site visit of June 1, 2000, manifests which were used since the last inspection were reviewed. All manifests were properly completed.

2) Included with the letter of May 3, 2000 was a copy of the facility's Source Reduction Strategy. This SRS addressed the residual waste streams produced at the facility. In order to satisfy the regulations as they pertain to large-quantity hazardous waste generators, the facility should create a new Source Reduction Strategy that addresses the hazardous waste streams produced at the facility.

The following violation have been corrected:

Line H006: A manifest was found that was not fully completed. Blocks 9 and 10 had been left blank. A destination facility was not designated on the manifest. This is contrary to 40 C.F.R. Part 262.20(b), as incorporated by 25 PA Code Chapter 262a.20, and to 25 PA Code Chapter 262a.20(1). C. R. Warner should designate a destination facility that is permitted to handle the waste on each outgoing manifest. C.R. Warner should also ensure that all outgoing manifests are fully and properly completed.

The following violation is still outstanding:

Line H020: A source reduction strategy was unable to be located during the inspection. This is contrary to PA Code Chapter 262a.100. The facility should prepare and implement a source reduction strategy and should keep this document on site and available for inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to facilityDate 6/8/2000Inspector (signature) Michelle MilburnDate 6/8/2000

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 June 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.One violation is outstanding. One violation has been corrected

A copy of this report was mailed to the facility on the date indicated below. The results of this inspection were discussed with Mr. Arrospide and Ms. Krawiecki before leaving the facility.

The following paragraph appeared in the inspection report of 3/1/2000:

"The hazardous waste petroleum storage area is in question with regards to compliance with the hazardous waste storage tank requirements found in 40 CFR Part 262.34 and Part 265, Subpart J. Please provide a written narrative to the Dept. to address C.R. Warner's procedures regarding waste oil refusal including on-site storage and transportation to Keystone Cement Co. This narrative should fully detail C.R. Warner's management of rejected waste oil from the time that the waste is determined to be unacceptable for processing to the time it is shipped off-site to a permitted facility. In this narrative you should also address your alternate plan for waste oil disposal during events where Keystone Cement Co. is not accepting wastes. If you have any questions about this request, please feel free to contact your waste management specialist, Michelle Milburn, at 610-832-6159."

This narrative is still being requested. This should be submitted as soon as possible so that a decision can be made as to the proper way to handle these hazardous wastes.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to facilityDate 6/8/2000Inspector (signature) Michelle MilburnDate 6/8/2000



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 3/1/2000

Time Start \_\_\_\_\_

Time Finish \_\_\_\_\_

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name C.R. Warner, Inc. I.D. Number PA0000538827Site Address 6050 W. Passyunk Ave., PhiladelphiaCounty Philadelphia Municipality Philadelphia Zip 19153Name of Inspector Michelle MilburnName & Title of Responsible Official Robert Krawiecki, President/ownerPerson Interviewed Rose Krawiecki / Javier Arrospe Telephone (215) 726-4300Mailing Address (if different from above) sameAmount of Hazardous Waste Generated per Month: \_\_\_\_\_ Pounds > 1,000 Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name C.R. Warner, Inc. License Number PA-AH 0460

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
<u>E005</u>	<u>Toluene</u>	<u>Marisol, Inc</u>
		<u>Middlesex, NJ</u>
		<u>NTJ 002454544</u>
<u>E002</u>	<u>Waste Petroleum Product</u>	<u>Keystone Cement, Co.</u>
		<u>Beth, PA</u>
		<u>PA0000389559</u>

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name C.R. Warner Inc. ID Number PA0000538827 Date 3/1/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
		X		Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
		X		Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		X		Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name C.R. Warner, Inc. ID Number PA0000538827 Date 3/1/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name C.R. Warner ID Number PA0000538827 Date 3/1/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				<b>LQG TANKS (Subchapter J)</b>			
		X		Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
		X		Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
		X		Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
		X		Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
		X		Tanks labeled to accurately identify contents	265a.194		H044
		X		Required inspections completed and documented in operating log	265a.195	265.195	H045
		X		Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
		X		Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
		X		Special small quantity generator requirements	265a.1	265.201	H048
				<b>SQG TANKS</b>			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
	X			Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
	X			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	X			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	X			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
	X			All waste removed at closure	265a.1	265.201(d)	H056
	X			Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
	X			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	X			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name C.R. Warner ID Number PA0000538827 Date 3/1/2000

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				<b>Containment Buildings (Subchapter T)</b>			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	X			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	X			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	X			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	X			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	X			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	X			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	X			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				<b>Drip Pads (Subchapter S)</b>			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
	X			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
	X			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
	X			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
	X			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
	X			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
	X			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
	X			Release reporting requirements met	265a.1	265.443(m)	H076
	X			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 March 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

A hazardous waste large-quantity generator inspection of C.R. Warner was conducted by Michelle Milburn and Andy Sinclair, Solid Waste Specialists, with the Department of Environmental Protection. Present from C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Manager.

The following observations were made:

1) C. R. Warner generates waste toluene and waste petroleum products. The toluene is generated in the on-site lab during acceptance testing of incoming wastes. The waste petroleum products are a result of incoming residual oils that fail the acceptance testing and are determined to be hazardous wastes. The waste toluene is transported to Marisol, Inc., for disposal, while the waste petroleum products go to Keystone Cement Co.

2) Waste toluene is initially stored in a satellite accumulation container in the lab. The lab was inspected and it was found that the accumulation container lacked proper labeling. The container should be marked as hazardous waste or in some way that identifies the contents. This correction was made during the inspection; proper labeling was added to the accumulation container. The waste toluene from the lab is transferred to a drum in an outside containment area. This area was inspected. At the time of the inspection, one drum of waste toluene was in the storage area. This drum was properly labeled, was fully closed, and had not been stored for greater than 90 days. The storage area had secondary containment.

3) A sample is procured from all incoming residual waste oil trucks. If the sample does not meet C. R. Warner's acceptance criteria, and the truck is from an outside hauling company, then the load is refused and sent back to the generator. If the truck is a C.R. Warner truck, the waste oil is kept on the truck which is parked at a designated area on site. Eventually the truck is sent out to Keystone Cement Co. At the time of the inspection, several trucks of refused waste oil were on site. They were parked on a concrete pad adjacent to the truck unloading area. Ms. Krawiecki stated that Keystone Cement Co. has temporarily ceased accepting these hazardous oils due to an equipment problem at that site. For this reason, C.R. Warner currently has more outgoing waste oil on site than usual. C.R. Warner manifests out these waste oils and assumes the role of generator of the waste. The trucks which store the waste oil prior to transportation to Keystone Cement Co.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to facilityDate 3/24/2000Inspector (signature) Michelle MilburnDate 3/24/2000



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 March 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

currently do not comply with all of the storage requirements for tanks (specifically labeling and secondary containment requirements).

4) Manifests for the waste toluene and waste petroleum were reviewed. One manifest was found on which the designated facility name and site address block (block #9) and the US EPA number block (block # 10) were not completed. The facility should ensure that all manifests are fully and properly completed. All copies of manifests were present, and past manifests were on file.

5) The facility PPC Plan was available and was inspected. The PPC Plan is currently being revised, but the available copy appeared to be complete. Ms. Krawiecki was unable to locate a Source Reduction Strategy for the facility. Employee training records were reviewed; the facility has recently conducted their annual OSHA refresher training course. The 1997 Hazardous Waste Biennial Report was on site. Ms. Krawiecki was in the process of typing up the 1999 report and stated that she would be submitting it shortly. Ms. Krawiecki verified that daily inspections of storage areas are conducted by Mr. Arrospide and she showed us a copy of the daily and weekly inspection report forms.

The following violations were observed:

Line H006: A manifest was found that was not fully completed. Blocks 9 and 10 had been left blank. A destination facility was not designated on the manifest. This is contrary to 40 C.F.R. Part 262.20(b), as incorporated by 25 PA Code Chapter 262a.20, and to 25 PA Code Chapter 262a.20(1). C. R. Warner should designate a destination facility that is permitted to handle the waste on each outgoing manifest. C.R. Warner should also ensure that all outgoing manifests are fully and properly completed.

Line H011: The satellite accumulation container in the lab lacked a 'hazardous waste' label. This is contrary to 40 CFR Part 262.34(c)(1)(ii) as incorporated by 25 PA Code Chapter 262a.10. The facility should provide a label on satellite accumulation containers that reads "hazardous waste" or in some way identifies the contents of the container.

\*\*\* This violation was corrected during the inspection.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) copy mailed to facilityDate 3/24/2000Inspector (signature) Michelle MillerDate 3/24/2000

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 01 March 2000Identification Number PA0000538827Company/Facility/Site Name C.R. Warner, Inc.

Line H020: A source reduction strategy was unable to be located during the inspection. This is contrary to PA Code Chapter 262a.100. The facility should prepare and implement a source reduction strategy and should keep this document on site and available for inspection.

Two Violations Are Being Cited. One violation has been corrected

The hazardous waste petroleum storage area is in question with regards to compliance with the hazardous waste storage tank requirements found in 40 CFR Part 262.34 and Part 265, Subpart J. Please provide a written narrative to the Dept. to address C.R. Warner's procedures regarding waste oil refusal including on-site storage and transportation to Keystone Cement Co. This narrative should fully detail C.R. Warner's management of rejected waste oil from the time that the waste is determined to be unacceptable for processing to the time it is shipped off-site to a permitted facility. In this narrative you should also address your alternate plan for waste oil disposal during events where Keystone Cement Co. is not accepting wastes. If you have any questions about this request, please feel free to contact your waste management specialist, Michelle Milburn, at 610-832-6159.

A copy of this report was mailed to the facility on the date indicated below. The results of this inspection were discussed with Mr. Arrospide and Ms. Krawiecki before leaving the facility.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Person interviewed (signature) copy mailed to facilityDate 3/24/2000Inspector (signature) Michelle MilburnDate 3/24/2000



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

11/04/98

Time Start

Time Finish

## HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name CR. WARNER INC. YANKEE POINT TERMINAL I.D. Number 301285  
 Site Address 61<sup>ST</sup> STREET & WEST PASSYUNK AVE, Phila.  
 County Phila Municipality Phila ZIP 19153  
 Name of Inspector DIRK ROBINSON  
 Name & Title of Responsible Official ROBERT J. KRAWIECKI / PRESIDENT - OWNER  
 Person Interviewed JOHN MYERS / OIL MANAGER Telephone (215) 926 4300  
 Mailing Address (if different from above) SAME  
 Amount of Hazardous Waste Generated per Month: \_\_\_\_\_ Pounds 24000 Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
D001	NAPHTHA SOLVENT	KEYSTONE CEMENT
F005	TOLUENE	



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name C.R. WARNER ID Number PA0000538827 Date 11/04/98  
1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS****1 2 3 4****REQUIREMENT****CHAPTER CIT.****LINE**

				<b>CONTAINERS (Subchapter I)</b>		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
				Containers of hazardous waste in good condition	265.171	H026
				Containers and stored waste compatible	265.172	H027
				Containers kept closed except during addition or removal of wastes	265.173	H028
				Containers managed to prevent leaks	265.173(b)	H029
				Containers labeled to accurately identify contents	265.173(c)	H030
				Container storage areas inspected at least weekly	265.174	H031
				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
				Proper containment and collection systems in place	265.178(a)-(d)	H033
				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				<b>TANKS (Subchapter J)</b>		
	X			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
				Special requirements for ignitable and reactive wastes followed	265.198	H046
	X			SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection: 11/04/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

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A hazardous waste follow up inspection was conducted by the Department on the above referenced facility. Violations that are still outstanding from the June 17, 1998 inspection are as follows:

1. Tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) of solvent, D001, were stored over the ninety (90) day limit.
2. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Department.

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This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

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Signature

*Dick K. Robinson*

Date

*11/17/98*

Page

*4 of 4*



Pennsylvania Department of Environmental Protection  
~~Lee Park, Suite 6010~~  
555 North Lane  
Conshohocken, PA 19428  
November 17, 1998

Southeast Regional Office

610-832-6212  
Fax 610-832-6143

**NOTICE OF VIOLATION**

Mr. Robert J. Krawiecki  
Yankee Point Realty  
61<sup>st</sup> Street and Passyunk Avenue  
Philadelphia, PA 19153

Re: Hazardous Waste Inspection  
C.R. Warner  
PA0000538827  
Philadelphia County  
June 17, 1998

Dear Mr. Krawiecki:

This letter is to confirm the findings of the Department's joint inspection with Environmental Protection Agency (EPA) on June 17, 1998, of your hazardous waste activities. Requirements for hazardous waste facilities are contained in the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq.; Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71-A § 510-17; and Chapters 260 through 270 of the rules and regulations of the Department. Violation of applicable sections of these regulations revealed during the Department's inspection on June 17, 1998 are as follows:

**§ 6018.401(a) - No person or municipality shall store, transport, treat, or dispose of hazardous waste within this Commonwealth unless such storage, transportation, treatment, or disposal is authorized by the rules and regulations of the department; no person or municipality shall own or operate a hazardous waste storage, treatment or disposal facility unless such person or municipality has first obtained a permit for the storage, treatment and disposal of hazardous waste from the department; and no person or municipality shall transport hazardous waste within the Commonwealth unless such person or municipality has first obtained a license for the transportation of hazardous waste from the department.**



C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

**§ 6018.403(a) - It shall be unlawful for any person or municipality who generates, transports or stores hazardous waste to transfer such waste unless such person or municipality complies with the rules and regulations of the Department and the terms or conditions of any applicable permit or license and any applicable order issued by the Department.**

C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

**§ 262.34(a) - Except as provided in subsections (d)-(f), a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status if the following apply under § 262.34 (a)(1-5)**

C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.



Mr. Robert J. Krawiecki

- 3 -

November 17, 1998

If you have any questions concerning this matter, please feel free to contact me at (610) 832-6168.

Sincerely,

A handwritten signature in black ink, reading "Dirk K. Robinson". The signature is written in a cursive, flowing style with a large initial "D".

Dirk K. Robinson  
Waste Management Specialist  
Waste Management Program

cc: Compliance  
EPA  
Field File  
Re 30 (SMC98)320-6



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

06/17/98

Time Start

8:00 AM

Time Finish

8:30 PM

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name C.R. WARNER - YANKEE POINT TERMINAL I.D. Number PA0000539827Site Address 61st STREET & West PASSYUNK AVE, Phila.County Phila Municipality Phila ZIP 19153Name of Inspector DIRK ROBINSONName & Title of Responsible Official ROBERT J. KRAWIECKI / PresidentPerson Interviewed JOHN MYERS / OIL MANAGER  
Javier Arrospe / Operations Manager Telephone (215) 726 4300Mailing Address (if different from above) SAMEAmount of Hazardous Waste Generated per Month: \_\_\_\_\_ Pounds > 1000 Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
<u>P001</u>	<u>NAPHA SOLVENT</u>	
<u>F005</u>	<u>TOLUENE</u>	

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT**  
**GENERATORS -- SMALL QUANTITY GENERATORS**  
**FACILITY SPECIFICS**

Site Name C.R. WARNER ID Number PA000538827 Date 06/17/98  
1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				<b>CONTAINERS (Subchapter I)</b>		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
		X		Containers labeled to accurately identify contents	265.173(c)	H030
	X			Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
		X		Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				<b>TANKS (Subchapter J)</b>		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
	X			Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

---

A hazardous waste inspection was conducted by the Department on the above referenced facility and the following violations were revealed:

1. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Department.
2. Incomplete personnel training program and/or records per § 265.16. No listing of job titles, no written job descriptions, no written description of the type of training required, not able to present records to indicate that all personnel required have had forty (40) hour training.
3. Two fifty-five gallon drums of toluene stored over the ninety (90) day limit.
4. Other violations as checked off on the inspection report

Information requested by the Department:

A. Available internal and external documentation of tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment), that includes their accumulation start dates, and lab results of each tanker.

B. Documentation of all returned loads to each customer for the past two years.

---

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature

*Dick K. Brown*

Date

*07/02/98*

Page

*4* of *5*

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

---

- C. Records for the past two years for any sludge's that have been shipped off site. The records should indicate where the sludge's originated from, their quantities, and their analytical results.
- D. Records of tank integrity tests and pipe line tests.
- E. The facility's last six (6) months of inspection records of tanks, drums, and tanker trucks.
- F. A hazardous waste analysis of the two fifty-five gallon waste toluene drums.
- G. C.R. Warner should notify the Department fourteen (14) days prior to shipping off site any of the tankers listed above in item (A).

---

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature

*Dick K. Robinson*

Date

07/02/98

Page

5 of 5



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

Time Start

Time Finish

06/17/98  
8:00 AM  
8:30 PM

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name C.R. WARNER - YANKEE POINT TERMINAL I.D. Number PA0000539827  
Site Address 61st STREET & West PASSYUNK AVE, Phila.  
County Phila Municipality Phila ZIP 19153  
Name of Inspector DIRK ROBINSON  
Name & Title of Responsible Official ROBERT J. KRAWIECKI / President  
Person Interviewed JOHN MYERS / OIL MANAGER Telephone (215) 726 4300  
Mailing Address (if different from above) SAME

Amount of Hazardous Waste Generated per Month: \_\_\_\_\_ Pounds > 1000 Kgs

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types \_\_\_\_\_

## 3. Hazardous Waste Transporters:

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
<u>D001</u>	<u>NAPHA SOLVENT</u>	
<u>F005</u>	<u>TOLUENE</u>	

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name C.R. WARNER ID Number PA000538827 Date 06/17/98

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				<b>CONTAINERS (Subchapter I)</b>		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
				Containers managed to prevent leaks	265.173(b)	H029
		X		Containers labeled to accurately identify contents	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
		X		Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				<b>TANKS (Subchapter J)</b>		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
				Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
				Release reported to Department within 24 hours, unless exempted	265.196	H045
				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047





**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

**INSPECTION REPORT COMMENTS**

**Date of inspection:** 06/17/98

**Facility/Site Name:** C.R. Warner, Inc. - Philadelphia County

---

A hazardous waste inspection was conducted by the Department on the above referenced facility and the following violations were revealed:

1. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Department.
2. Incomplete personnel training program and/or records per § 265.16. No listing of job titles, no written job descriptions, no written description of the type of training required, not able to present records to indicate that all personnel required have had forty (40) hour training.
3. Two fifty-five gallon drums of toluene stored over the ninety (90) day limit.
4. Other violations as checked off on the inspection report

**Information requested by the Department:**

A. Available internal and external documentation of tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment), that includes their accumulation start dates, and lab results of each tanker.

B. Documentation of all returned loads to each customer for the past two years.

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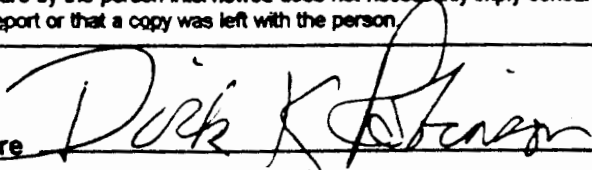
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Signature



Date

07/02/98

Page

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

---

- C. Records for the past two years for any sludge's that have been shipped off site. The records should indicate where the sludge's originated from, their quantities, and their analytical results.
- D. Records of tank integrity tests and pipe line tests.
- E. The facility's last six (6) months of inspection records of tanks, drums, and tanker trucks.
- F. A hazardous waste analysis of the two fifty-five gallon waste toluene drums.
- G. C.R. Warner should notify the Department fourteen (14) days prior to shipping off site any of the tankers listed above in item (A).

---

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature

*Dick K. Robinson*

Date

07/02/98

Page

5 of 5



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
July 22, 1998

Southeast Regional Office

Phone 610-832-6100  
Fax 610-832-6100

Mr. Robert J. Krawiecki  
Yankee Point Realty  
61<sup>st</sup> Street and Passyunk Avenue  
Philadelphia, PA 19153

Re: Hazardous Waste Inspection  
PA0000538827  
Philadelphia County  
June 17, 1998

Dear Mr. Krawiecki:

This letter is to confirm the findings of the Department's joint inspection with the Environmental Protection Agency (EPA) on June 17, 1998, of your hazardous waste activities. Requirements for hazardous waste facilities are contained in the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq.; Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71- A § 510-17; and Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations revealed during the Department's inspection on June 17, 1998 are as follows:

**§ 262.34(a) - Except as provided in subsections (d)-(f), a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status if the following apply under § 262.34 (a)(1-5)**

C.R. Warner, Yankee Point Terminal stored two-55 gallon containers of solvent waste for more than 90 days.

**§ 262.34(a)(5) - The generator complies with the requirements for owners or operators in Chapter 265, Subchapters C and D (relating to preparedness and prevention; and preparedness, prevention and contingency (PPC) plan and emergency procedures) and with § 265.16 (relating to personnel training).**

It was determined that C.R. Warner, Yankee Point Terminal had incomplete personnel training records. Personnel training records did not have listing of job titles, written job descriptions, ~~or~~ written description of the type of training required. C.R. Warner, Yankee Point Terminal was not able to present records to indicate that all persons required to have 40 hour training have completed the training.

**§ 262.40(b) - A generator shall retain a copy of each biennial report and exception report for at least 3 years from the due date of the report.**

C.R. Warner, Yankee Point Terminal was not able to furnish a copy of the latest hazardous waste biennial report at the time of the inspection.

**§ 262.41 - A generator other than a small quantity generator or a conditionally exempt small quantity generator shall submit biennial reports as required under § 262.41.(1-2).**

**§ 265.173(c) - A container shall be labeled to accurately identify the contents.**

C.R. Warner, Yankee Point Terminal failed to accurately identify one (55) gallon container of solvent waste.

**§ 265.178(a) - Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation.**

C.R. Warner, Yankee Point Terminal failed to store three (55) gallon containers in a proper containment area.

**§ 6018. 403(a) - It shall be unlawful for any person or municipality who generates, transports or stores hazardous waste to transfer such waste unless such person or municipality complies with the Rules and Regulations of the Department and the terms or conditions of any applicable permit or license and any applicable order issued by the Department.**

C.R. Warner, Yankee Point Terminal failed to comply with the rules and regulations of the Department.

**§ 6018.403(b)(2) - It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to label any containers used for the storage of such hazardous waste so as identify accurately such waste.**

C.R. Warner, Yankee Point Terminal failed to properly identify one (55) gallon container of solvent.

**§ 6018.403(b)(9) - It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to treat, store and dispose of all waste in accordance with the Rules and Regulations of the Department, permits, permit conditions and orders of Department.**

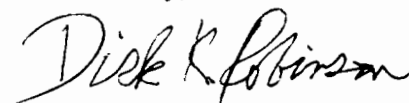
You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are requested to submit to the Department within 14 days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6168.

Sincerely,



Dirk K. Robinson  
Waste Management Specialist  
Waste Management Program

cc: Compliance  
EPA  
Field File  
Re 30 (SM)921